

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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PATRICK J. CALLAHAN, JR.,	:	
	:	
Plaintiff,	:	
	:	No. 10 Civ. 4599 (BSJ) (JLC)
v.	:	
	:	
CREDIT SUISSE (USA), INC., CREDIT SUISSE	:	<b>DECLARATION OF</b>
GROUP SA, CREDIT SUISSE SECURITIES	:	<b>JAUNELLE CHAPMAN</b>
(USA) LLC, and CREDIT SUISSE	:	
FIRST BOSTON CORPORATION,	:	
	:	
Defendants.	:	
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I, Jaunelle Chapman, pursuant to 28 U.S.C. §1746, declare and state as follows:

1. I am a paralegal with Credit Suisse Securities (USA) LLC (“Credit Suisse”), a Defendant in this action. I am familiar with the facts and circumstances set forth herein, and this Affidavit is true to the best of my personal knowledge. I submit this Affidavit to put before the Court certain documents relevant to Defendants’ motion to dismiss.

2. Annexed hereto as Exhibit 1 is a true and correct copy of a letter addressed to Patrick Callahan, dated September 27, 2000, and maintained on file by Credit Suisse in the course of its regularly conducted business.

3. Annexed hereto as Exhibit 2 is a true and correct copy of a letter addressed to Patrick J. Callahan Jr., dated April 3, 2001, and maintained on file by Credit Suisse in the course of its regularly conducted business.

4. Annexed hereto as Exhibit 3 is a true and correct copy of a letter addressed to Patrick J. Callahan Jr., dated January 14, 2002, and maintained on file by Credit Suisse in the course of its regularly conducted business.

5. Annexed hereto as Exhibit 4 is a true and correct copy of a handwritten document captioned “In the Matter of Callahan v. CSFB, LLC,” executed by Peggy Campbell, Patrick J. Callahan Jr. and Roger Ziman, dated March 6, 2003, and maintained on file by Credit Suisse in the course of its regularly conducted business.

6. Annexed hereto as Exhibit 5 is a true and correct copy of a letter addressed to Patrick J. Callahan Jr., dated April 9, 2003, captioned “DRAFT 4/9/2003 THIS IS NOT AN OFFER – SUBJECT TO INTERNAL APPROVAL,” and maintained on file by Credit Suisse in the course of its regularly conducted business.

7. Annexed hereto as Exhibit 6 is a true and correct copy of a letter and enclosure from Benjamin D. Steiner, Esq. to Anita Raman, Esq., dated October 14, 2003, and maintained on file by Credit Suisse in the course of its regularly conducted business.

8. Annexed hereto as Exhibit 7 is a true and correct copy of a letter addressed to Mr. Patrick J. Callahan Jr., dated April 7, 2009, and maintained on file by Credit Suisse in the course of its regularly conducted business.

9. Annexed hereto as Exhibit 8 is a true and correct copy of a letter from Benjamin D. Steiner, Esq. to Brennan S. McDonough, dated April 13, 2009, and maintained on file by Credit Suisse in the course of its regularly conducted business.

10. Annexed hereto as Exhibit 9 is a true and correct copy of an email and attachment to Benjamin D. Steiner, Esq. to Brennan S. McDonough, cc: Patrick Callahan, sent May 7, 2009 at 11:47 a.m., and maintained on file by Credit Suisse in the course of its regularly conducted business.

11. Annexed hereto as Exhibit 10 is a true and correct copy of a letter addressed to Mr. Patrick J. Callahan Jr., dated April 7, 2009 and captioned “REVISED MAY 11, 2009,”

transmitted to Mr. Patrick J. Callahan Jr. via Federal Express overnight delivery on May 11, 2009, and maintained on file by Credit Suisse in the course of its regularly conducted business.

12. Annexed hereto as Exhibit 11 is a true and correct copy of a letter and enclosure from Benjamin D. Steiner, Esq. to Brennan S. McDonough, dated and mailed via Federal Express on May 21, 2009, and maintained on file by Credit Suisse in the course of its regularly conducted business.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 28, 2011.

  
Jaunelle Chapman